

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS HOUSTON DIVISION**

UNITED STATES OF AMERICA
PLAINTIFF,

VS.

CHRISTOPHER MERHAN
JUDGMENT DEFENDANT,

AND

PROSOURCE SOLUTIONS, INC.
GARNISHEE

CRIMINAL NO. 4:97-CR-191-05

ANSWER TO WRIT OF GARNISHMENT
BY PROSOURCE SOLUTIONS, INC.

TO THE HONORABLE JUDGE OF THIS COURT:

ProSource Solutions, Inc., Garnishee, files this original answer to the writ of garnishment entered on or about August 21, 2014 and served on garnishee, and in answer shows the following:

1. The writ was served on Garnishee on September 5, 2014.
2. As of September 5, 2014 Garnishee was indebted to Christopher Merhan in the amount of \$25,107.82; consisting of the balance contained in a 401k plan account for Christopher Merhan and as to which ProSource Solutions, Inc. is the plan sponsor. The account consists of various securities, so that the actual account balance varies from day to day with changes in the stock market. As of Sept. 9, 2014 the market value of the account was approximately \$24,954.06.
3. Garnishee is aware of no prior garnishment actions affecting these funds.
4. Except for any increase in the value of the 401K account, Garnishee does not anticipate that it will owe additional funds to either Christopher Merhan or Amanda Merhan in the future.
5. ProSource Solutions, Inc. does not know whether the judgment defendant has any possible exemptions of defenses to the writ of garnishment.

6. As of September 5, 2014 and through the date of this Answer, Garnishee was not in possession of any effects belonging to Christopher Merhan and/or his spouse Amanda Merhan.
7. ProSource Solutions, Inc. is not aware of any other entity owing any debts to Christopher Merhan and/or his spouse Amanda Merhan, or possessing effects belonging to Christopher Merhan and/or his spouse Amanda Merhan.

WHEREFORE, ProSource Solutions, Inc. respectfully requests:

1. That all claims to the funds be determined and adjudicated, and that ProSource Solutions, Inc. be discharged from all liability to the United States of America, Christopher Merhan and/or Amanda L. Merhan with respect to the funds.
2. All such other and further relief to which ProSource Solutions may show itself properly entitled.

Respectfully submitted,

By: 

Robert C. Rice
State Bar No. 16833990

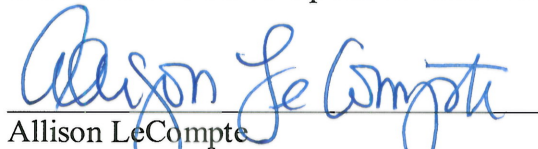
Rice & Associates, PC
1010 Lamar, Suite 1530
Houston TX 77002
(713) 655-9090
rrice@rice-law.com

**Attorney-In-Charge for
ProSource Solutions, Inc.**

VERIFICATION

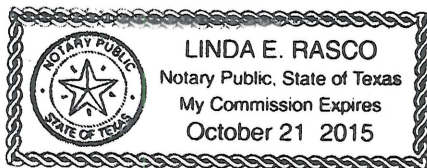
STATE OF TEXAS §
 §
COUNTY OF HARRIS §

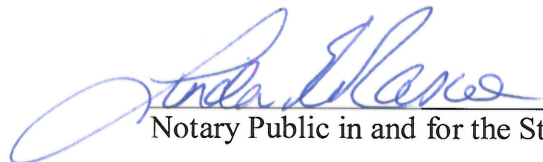
BEFORE ME, the undersigned Notary Public, on this day personally appeared **Allison LeCompte**, who, being by me duly sworn on oath deposed and said that she is the president of ProSource Solutions, Inc. in the above-entitled and numbered cause; that he has read the above and foregoing Answer to the Writ of Garnishment; and that every statement contained in that document is within his personal knowledge and is true and correct.


Allison LeCompte
President, ProSource Solutions, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on this 12th day of September, 2014 by Allison LeCompte who proved to me on the basis of satisfactory evidence to be the person who appeared before me.

{SEAL}




Notary Public in and for the State of Texas

CERTIFICATE OF SERVICE

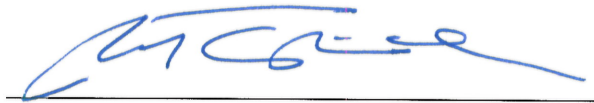
I hereby certify that on this 12TH day of September, 2014, that a true and correct copy of the foregoing Answer to Writ of Garnishment was sent by certified mail, return receipt requested, to the following persons:

United States Attorney Southern District of Texas Attn: Martha Minnis
1000 Louisiana Street, Suite 2300
Houston, TX 77002
CMRRR NO. 7006 2150 0000 3460 2356

Christopher Merhan
P.O. Box 133053
Spring, TX 77393-3053
CMRRR NO. 7006 2150 0000 3460 2349

Christopher Merhan
18047 Vahorn Ct
Spring, TX 77379-5153
CMRRR NO. 7006 2150 0000 3460 2332

Amanda L. Merhan
18047 Vahorn Ct
Spring, TX 77379-5153
CMRRR NO. 7006 2150 0000 3460 2325



Robert C Rice